

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

JANE DOE,

Plaintiff,

v.

Case No. 3:23-cv-00018-RSB

**RECTOR AND VISITORS OF THE
UNIVERSITY OF VIRGINIA,**

Defendant.

**PLAINTIFF'S REPLY IN SUPPORT OF
MOTION TO EXTEND RESPONSE DEADLINE**

Plaintiff Jane Doe, through undersigned counsel, respectfully submits this Reply in Support of her Amended Motion to Extend Response Deadline (ECF No. 76). Plaintiff respectfully requests that the deadline to file her responses to Defendant's Motion for Summary Judgment and Motion to Exclude Plaintiff's Expert Witness Andrew C. Verzilli be extended from October 9, 2024, to October 23, 2024.

ARGUMENT

Counsel for Plaintiff regularly practices in courts across the country that work with counsel on all sides to grant extensions when necessary for good cause. Plaintiff has presented ample good cause to extend the deadline to file both motion responses to October 23, 2024. Plaintiff understands and respects Defendant's need to represent itself and have sufficient time to argue any motions. Plaintiff believes the Court is best positioned to know if an amendment to its scheduling order is necessary to allow all parties time to argue any necessary motions and to allow the Court the time it needs to rule on such. As counsel for Plaintiff discussed with counsel

for Defendant via phone on Monday, September 30, 2024, Plaintiff is willing to move the oral argument deadline and the trial if necessary to accommodate this deadline.

Plaintiff does not presume to know what period of time the Court needs to hear and rule on such motions; however, if a proposed schedule would be useful to the Court, Plaintiff provides the following by way of suggestion:

- Deadline to file responses to dispositive motions and motions to exclude: October 23, 2024
- Deadline to file replies to the above: October 30, 2024
- Deadline to hear motions on the above: November 1, 2024

Plaintiff and her counsel stand ready to work collaboratively with Defendant and this Court to modify the schedule in any way necessary to ensure fair representation and due process for all in this proceeding.

CONCLUSION

Good cause exists to grant the requested extension. Counsel for Plaintiff are working diligently to comply with all Court deadlines. The extension of time requested, along with any necessary scheduling modifications, will not cause any undue hardship or prejudice to any party. Failure to grant the Motion will cause prejudice to Plaintiff.

WHEREFORE, Plaintiff respectfully requests that this Court extend the deadline to file her responses to Defendant's Motion for Summary Judgment and Motion to Exclude Plaintiff's Expert Witness Andrew C. Verzilli to October 23, 2024.

Dated: October 2, 2024

Respectfully submitted,

s/Elizabeth K. Abdnour
Elizabeth K. Abdnour

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CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of October, 2024, a true and accurate copy of the foregoing document was filed using the Court's ECM/ECF filing system, which will send an electronic notification to all counsel of record.

s/ Elizabeth K. Abdnour
Attorney at Law
Attorneys for Plaintiff